

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	§	
	§	
Transition from TTY to Real-Time Text	§	CG Docket No. 16-145
Technology	§	
	§	GN Docket No. 15-178
Petition for Rulemaking to Update the	§	
Commission's Rules for Access to Support the	§	
Transition from TTY to Real-Time Text	§	
Technology, and Petition for Waiver of Rules	§	
Requiring Support of TTY Technology	§	

**INITIAL COMMENTS OF TEXAS 9-1-1 ENTITIES**

The Texas 9-1-1 Alliance,<sup>1</sup> the Texas Commission on State Emergency Communications,<sup>2</sup> and the Municipal Emergency Communication Districts Association<sup>3</sup> (collectively, the "Texas 9-1-1 Entities") respectfully submit the following brief initial comments in the Federal Communication Commission's (the "Commission's") Further Notice of Proposed Rulemaking ("FNPRM") in the above-referenced proceeding. In the FNPRM, the Commission

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<sup>1</sup> The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 26 Texas emergency communication districts with E9-1-1 service and related public safety responsibility for more than approximately 63% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code Section 771.001(3)(B).

<sup>2</sup> The Texas Commission on State Emergency Communications ("CSEC") is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and by statute is the state program authority on emergency communications. CSEC's membership includes representatives of the Texas 9-1-1 Entities and the general public, and directly oversees and administers the Texas state 9-1-1 program under which 9-1-1 service is provided in 81% of Texas' 254 counties, covering approximately 27% of the state's population.

<sup>3</sup> The Municipal Emergency Communication Districts Association ("MECDA") is an association of 26 municipal emergency communication districts, as defined under Texas Health and Safety Code Section 771.001(3)(A), that are located primarily in the Dallas-Fort Worth area.

seeks additional comments on the transition from text telephone (“TTY”) technology to real-time text (“RTT”) communications over wireless Internet Protocol (“IP”)-enabled networks,<sup>4</sup> including a proposed 2021 sunset date for the RTT to TTY backward compatibility requirement.<sup>5</sup>

## I. Initial Comments

Given the ongoing progress in the transition to modern IP communications technologies (including, as part of this transition, the provision of critical 9-1-1 service), it is reasonable for the Commission to provide that the RTT to TTY backward compatibility requirement should not be imposed on the wireless IP-enabled network carriers on a permanent basis. However, prior to the Commission establishing a specific date for termination of the RTT to TTY backward conversion requirement (such as the proposed 2021 sunset date in the FNPRM or another

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<sup>4</sup> *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-169 (rel. Dec. 16, 2016) (“RTT Order”). (The RTT Order is available on the Commission’s website at <https://www.fcc.gov/document/adoption-real-time-text-rtt-rules>.) See also, *Announcement of Effective Date for Real-Time Text Rules and Comment and Reply Comment Deadlines for the Further Notice of Proposed Rulemaking* (rel. Feb. 7, 2017) (available at [http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2017/db0207/DA-17-137A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2017/db0207/DA-17-137A1.pdf)).

<sup>5</sup> The Commission stated:

We note that by 2021, Tier I wireless service providers will have had the opportunity to support RTT on their IP-based networks for three years, manufacturers will have been producing RTT-compliant equipment for two years, and smaller wireless service providers will have supported RTT on their networks for at least 18 months. For these reasons, and because by such date, we expect to have data sufficient to assess adoption of RTT technology, *we propose to set a sunset date for RTT-TTY backward compatibility of 2021* unless the Commission finds a reason to extend this deadline. We seek comment on this proposal, and whether there is a different point in time *when it would be appropriate for the Commission to reassess the need* for covered entities to continue supporting TTY technology via backward compatibility on their IP-based voice service networks. For example, should our reassessment be tied in any way to the implementation of the deployment of RTT technology over wireline networks, or should this reassessment take place after the sunset of the PSTN and the transition of all consumers to IP-based wireless *and* wireline networks? (Emphasis added) [Footnotes omitted].

RTT Order at ¶76.

reassessment date<sup>6</sup>), there should be an established working industry alternative to RTT to TTY backward conversion in place. The elimination of any RTT to TTY backward conversion requirement, at a minimum, should be based on deployments of fully IP end-to-end RTT to RTT for 9-1-1 service, testing and comparative evaluation by telecommunicators at multiple PSAPs.

Accordingly, the Commission should take no further action at this time regarding a specific date (whether 2021 or another reassessment date) to terminate the Commission's RTT to TTY backward conversion requirement. Instead, during the next year the Commission should gather information on: (i) the extent of actual working deployments of fully IP end-to-end RTT to RTT for 9-1-1 service (including testing and comparative evaluation at various PSAPs); and (ii) any potentially associated relevant changes in responsibilities for other involved 9-1-1 stakeholders in the absence of the Commission's backward conversion requirement (including whether conversion responsibility would be transferred to another service provider [such as the legacy 9-1-1 selective router provider], any new costs, and any changes in expectations related to RTT by the United States Department of Justice). Thereafter, the Commission should perform a reassessment of the issue, if still necessary, in each subsequent year for as long as needed.

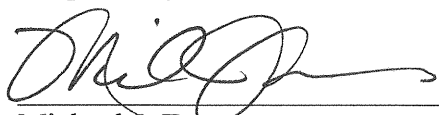
## **II. Conclusion**

The Texas 9-1-1 Entities appreciate the opportunity to provide these initial comments on these matters, and respectfully request that the Commission take action on these matters consistent with these initial comments.

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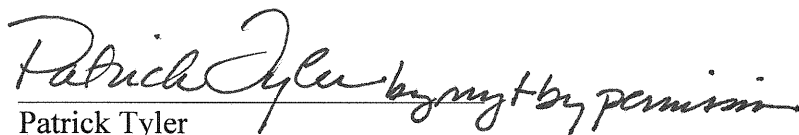
<sup>6</sup> *Id.*

Respectfully submitted,



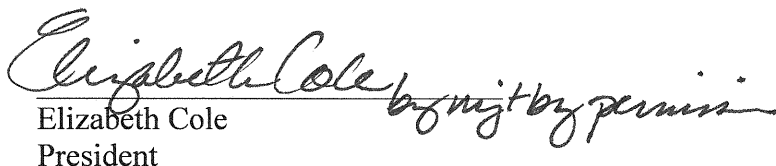
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February 22, 2017